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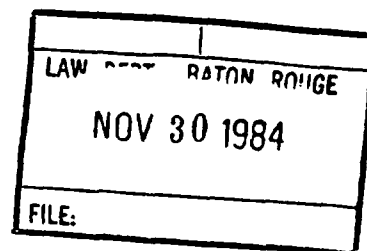
D. Bach - BR Tower

156730

Ethyl Petroleum Additives
Sauget, Illinois 62201
(618) 274-4000

November 26, 1984

Mr. Dan Hopkins
On Scene Coordinator
U.S. EPA
Region V
230 S. Dearborn Street
Chicago, IL 70704



Dear Mr. Hopkins:

Ethyl Petroleum Additives, Inc. like any industry has construction needs from time to time. Accordingly, we are at this time proposing to undertake two construction projects in a manner that is consistent with the protection of the environment and employees and with the intent of administrative order V-W-84-007. At the same time, our proposal, as outlined below, will allow additional construction projects to be undertaken and completed in an efficient manner without having to discuss each particular construction project that may be required.

Our proposal does not address construction projects that do not involve earth movement. This is due to the fact that there is no concern in such projects about 2, 3, 7, 8 TCDD and no special precautions are warranted.

The sampling data accumulated to date, along with our knowledge of the Monsanto pesticide activity which resulted in the presence of 2, 3, 7, 8 TCDD, allow us to define the lateral extent of the presence of 2, 3, 7, 8 TCDD in our facility. Therefore, construction involving earth movement can proceed in most areas of the plant without concern for 2, 3, 7, 8 TCDD.

More specifically, our proposal is based on three levels of 2, 3, 7, 8 TCDD.

1. 2, 3, 7, 8 TCDD presence at 1 ppb or lower does not warrant special precautions. Therefore, construction projects involving movement of earth in these areas will be undertaken and completed without notification to your office.
2. 2, 3, 7, 8 TCDD at levels between 1 ppb and less than 7 ppb require special precautions for protection of the environment and employees, and to meet the intent of administrative order V-W-84-007. When construction projects involving earth movement in these areas is required, Ethyl Petroleum Additives, Inc. will proceed with personal protective equipment and decontamination procedures, which were previously submitted in response

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to administrative order V-W-84-007. Since these plans have previously been accepted by the agency, we will not contact your office when this type construction project is implemented.

3. 2, 3, 7, 8 TCDD at 7 ppb or greater requires added special precautions. Therefore, no construction will be undertaken in these areas without prior discussion with your office. We have indicated these areas in the enclosed map.

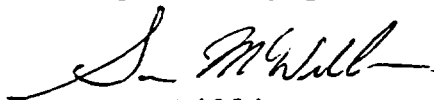
In areas where we have determined the 2, 3, 7, 8 TCDD to be present in soil in the 1 to 7 ppb range, the project will be designed to disturb the minimum amount of earth. The project will be designed to use the disturbed earth as backfill and to cap the disturbed earth. If there is any disturbed earth that cannot be used as backfill, we will move it to the north end of the plant where earth has previously been placed, and provide a suitable grade and cap.

As indicated above, we currently have two urgent projects which need to be implemented immediately. Both of these construction projects involve areas that are in category #2.

I am by this letter also requesting a meeting to further discuss this proposal and request that this meeting be scheduled as quickly as your schedule will allow. I would prefer if the meeting could be completed prior to the first week in December. My staff will be in contact with you to set up this meeting.

Due to the urgency involved in our construction plans, we would very much like to be able to completely resolve any item related to this proposal and obtain agency approval of the plan at this meeting. I am available at your convenience.

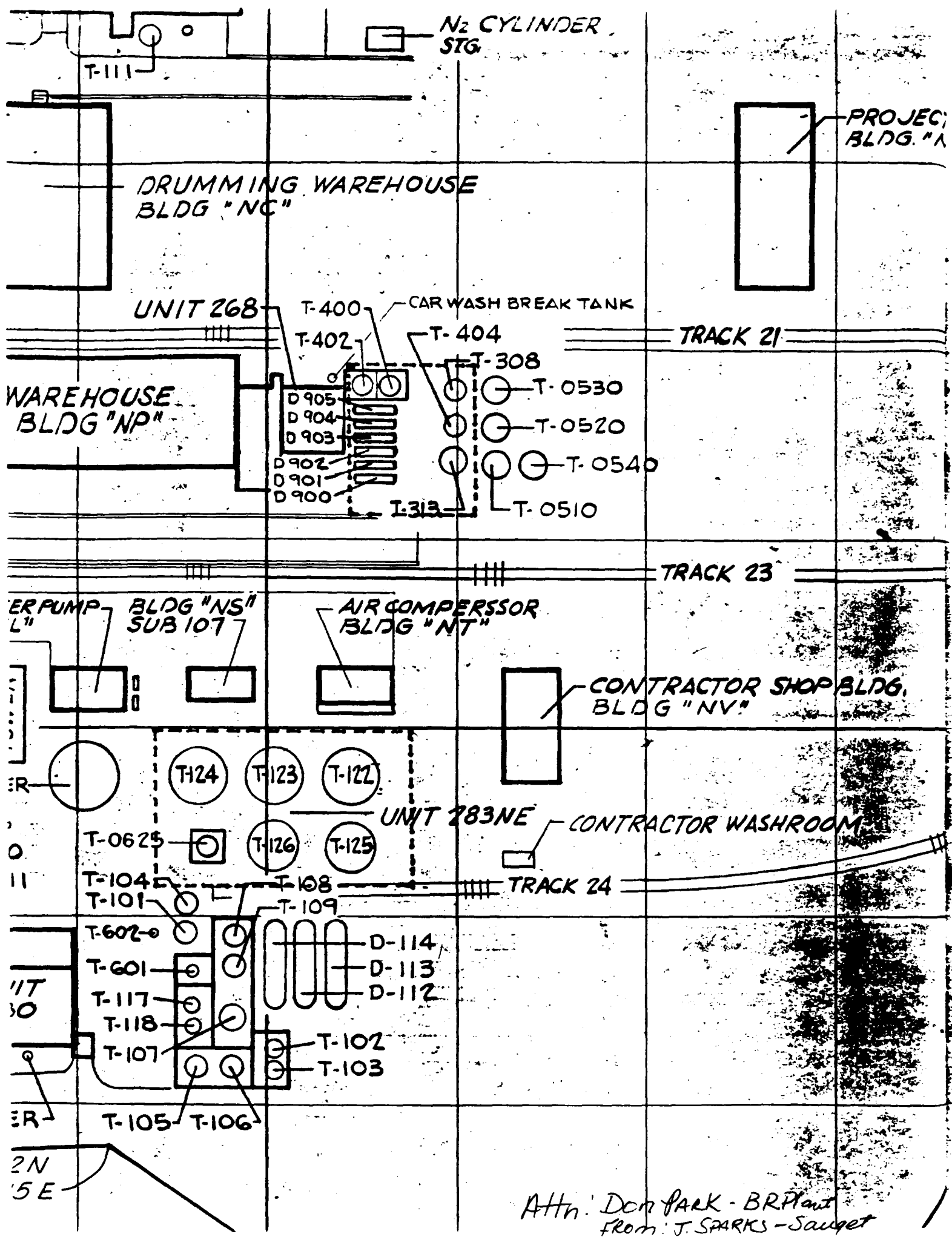
Respectfully yours,



Sam McWilliams
Plant Manager

SM/bb

Enclosure



ATTN: DON PARK - BR Plant
FROM: J. SPARKS - Sargent